

MICHELE BECKWITH
Acting United States Attorney
DAVID SPENCER
HADDY ABOUZEID
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GIOVANNI ELEAZAR PACO,

Defendant.

CASE NO. 2:23-CR-214-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 27, 2025
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

1. This matter was set for status conference before the Honorable William B. Shubb on May 27, 2024. Time has been excluded through and including May 27, 2025.

2. By this stipulation, the parties request to continue the status conference to **August 18, 2025, at 10:00 a.m.**, and to exclude time between May 27, 2025, and August 18, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes investigative reports and related documents in electronic form including over 4,698 pages of documents, numerous photographs, lab reports, criminal history reports, multiple video and audio recordings, and other material. All of this discovery has been either produced directly to counsel and/or made available for inspection.

b) Counsel for defendant desires additional time to consult with his client, review the charges, conduct investigation and research related to the charges, review the discovery, discuss potential resolutions with his client, prepare pretrial motions, and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 27, 2025 to August 18, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 20, 2025

Respectfully Submitted,

MICHELE BECKWITH
Acting United States Attorney

By: /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

Dated: May 20, 2025

/s/ MICHAEL E. HANSEN
MICHAEL E. HANSEN
Counsel for Defendant
Jiovanni Eleazar Paco

ORDER

IT IS SO FOUND AND ORDERED.

Dated: May 21, 2025



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE